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June 17, 2020

BY ECF

Hon. Mary Kay Vyskocil
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *R3Asia Pacific, PTE, LTD and R3 Worldwide, Inc. v. Melissa Lea*
U.S. District Court, Southern District of New York
Case No. 1:20-cv-01941

Dear Judge Vyskocil:

Pursuant to Fed. R. Civ. P. 6(b), Local Rule 7.1(d), and Rule 2.G of Your Honor's Individual Rules of Practice in Civil Cases, Defendant Melissa Lea, by her counsel, moves, with agreement and consent of Plaintiff's counsel, to extend from June 18 until July 2, 2020 the date for Defendant to file and serve a pleading in response to the Complaint and Summons served April 16, 2020. The original due date was May 7, 2020. There have been three prior extensions, jointly requested by the parties to allow ongoing settlement discussions. Yesterday the parties agreed on a definitive written settlement agreement. Ms. Lea signed the agreement yesterday, and it is anticipated that Plaintiffs will sign today. The agreement will become effective after expiration of the ADEA's statutory 7-day revocation period, and shortly thereafter Plaintiff's counsel will file a Notice of Dismissal with Prejudice in compliance with the settlement agreement. There is good cause for submission of this request less than 72 hours prior to the June 18 deadline because final negotiation of the agreement had been understandably slowed by Plaintiff's lead counsel dealing with a death in his immediate family and Ms. Lea dealing with a recent death in her family. The resources of the Court and the parties will be conserved by the requested extension.

For the above reasons, Defendant respectfully requests a two-week extension of time until July 2, 2020 to file and serve a pleading in response to the Complaint and Summons.

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Granted. SO ORDERED.

JNR/jlf

cc: Christian J. Jensen, Esq. (v)
Howard Matalon, Esq. (via
Stanley K Shapiro, Esq. (v
T. Christopher Donnelly (v

Date: 6/18/2020
New York, New York

Mary Kay Vyskocil
United States District Judge